Minnesota Department of Transportation

Transportation Building
395 John Ireland Boulevard
Saint Paul, Minnesota 55155-1899

HQ257

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U.S. Department of Transportation
Docket Operations, M-30, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

RE: RITA-2007-28836 - 31

The Minnesota Department of Transportation (Mn/DOT) sees a need to continue the development and maintenance of the NDGPS.

To say that there is no role for the NDGPS supporting Transportation and Infrastructure is incorrect. Mn/DOT employs "mapping grade" receivers in conjunction with the NDGPS system for a number of applications. These include: Soils' use for their auger truck to navigate the proposed alignment and locate test holes; Hydraulics' for locating and inventorying culverts; Preliminary Design in locating wetlands; Maintenance for locating snow drift areas; and Environmental Services to locate Native American burial mounds, to name a few. As all of these activities, which rely upon the NDGPS system, support either the construction or maintenance of the Transportation Infrastructure, and since to replace their current receivers with ones that would achieve the same accuracies without that system would cost an order of magnitude more, the NDGPS has a direct impact upon the Transportation System, and consequently, the "public, health, safety, and welfare."

Furthermore, while much of Minnesota is covered by a Virtual Reference Station (VRS)/Continuously Operating Reference Station (CORS) system operated by Mn/DOT that at first glance may seem a possible replacement; this is not necessarily the case. To begin with, the Mn/DOT system does not yet provide statewide coverage. More importantly however, is the fact that the Mn/DOT system relies upon the NDGPS stations for controlling adjustments. To discontinue the inland component of the NDGPS would result in the Mn/DOT VRS/CORS having less stability. This in turn would introduce more variability into the surveys performed by both Mn/DOT personnel and by the private sector, a move away from the growing consistency that currently helps reduce discrepancies and the resulting litigation; and that in turn would be a detriment to the welfare of the public as well as increasing the costs of Transportation Infrastructure development. Further harming public welfare is the fact that without a uniform national control basis, surveys near or crossing the State boundaries would be subject to variability.

For these reasons, Mn/DOT sees a need to continue the inland NDGPS program, both from a "public health, safety and welfare" perspective, and from a Transportation Infrastructure point-of-view.

Sincerely,

Richard L. Arnebeck, Director
Engineering Services Division